

# **EXHIBIT A**



Paul J. Hayes  
Direct Dial: 617-456-8027  
phayes@princelobel.com

July 29, 2020

VIA EMAIL

Matthias A. Kamber  
Keker, Van Nest & Peters LLP  
633 Battery Street  
San Francisco, CA 94111

Re: *Singular Computing LLC v. Google LLC*  
Case No.: 1:19-cv-12551-FDS

Dear Matthias:

Thank you for your letter of July 23, 2020 regarding the various deposition notices Singular served on Google on July 10, 2020.

*First*, we agree that all depositions of either party shall be via video/teleconference. This will protect the safety of all witnesses, and, as you note, is consistent with the general orders of the court.

*Second*, we have noticed the depositions well after Google's document production to avoid the necessity of taking the witnesses more than once. Our first document request is extensive and requires the production of all documents relating to the witnesses. However, to the extent Google refuses to produce the documents, delays or obfuscates the timely production of its documents, and conveniently produces same after the deposition of the noticed witnesses, then indeed we will request the court not only to retake the depositions but to impose sanctions associated with Google's noncompliance.

We agree to serve a 30(b)(6) notice pursuant to your request. We likewise anticipate that at least one or more of the witnesses you may notice of Singular may also serve as a 30(b)(6) witness. Accordingly, by the end of August we should exchange our 30(b)(6) witness deposition notice. This will allow both parties to designate and prepare witnesses whose deposition are already scheduled to proceed and avoid duplication of efforts.

Prince Lobel Tye LLP  
One International Place  
Suite 3700  
Boston, MA 02110  
TEL: 617 456 8000  
FAX: 617 456 8100

[www.princelobel.com](http://www.princelobel.com)



*Third*, the individuals we have noticed are directly involved in this case as is apparent from the complaint. We appreciate their position at Google but we cannot agree to a fixed amount of time on the record. Singular will determine the time necessary per witness, not Google. It is not our intent to depose any of these witnesses longer than necessary to obtain the desired information. With regard to Dr. Patterson, he also is directly involved in this case and will be deposed as noticed. The question of whether to depose Dr. Patterson is made by Singular, not Google. Singular believes that his deposition is warranted and will proceed as indicated.

Please proceed to timely produce the requested documents and begin the process of scheduling the depositions thereafter.

Best regards,

*/s/ Paul J. Hayes*

Paul J. Hayes